

# **Cannock Chase Local Plan (Part 2) Issues & Options Consultation**

## **Summary of Representations**

### **Sustainability Appraisal & Habitat Regulations Assessment**

**August 2017**

**Local Plan Part 2 Issues and Options Sustainability Appraisal**

<b>Rep ID No.</b>	<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
IOSA1	Bromford (c/o Pegasus Group)	<p>Comment on Sustainability Appraisal conclusions on the site (C64). Contend that the sites' biodiversity and geodiversity score (SA objective 1) should be reappraised based upon its potential to have a positive effect on this objective by including green infrastructure on site. Note that the site is not Green Belt or AONB land and that it lies within the urban area, forming a logical extension to the settlement.</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon following the production of the August 2016 SA Scoping Report. Design details are not known for all sites and will not necessarily be those promoted by developers, therefore assessments have not assumed mitigation will be provided, to ensure consistency across the entirety of the SA Report. Appraisal work has been undertaken at a level of detail that is proportionate to the plan.</p> <p>Site C64 is located within close proximity of a national biodiversity site and as such in line the SA assumptions a significant negative effect has been recorded for SA objective 1 (biodiversity and geodiversity). Landscape issues have been addressed separately through SA objective 6. Although the site lies mostly on land which has been identified as being urban land in the Landscape Character Assessment for Cannock Chase District it is located within 1km of Cannock Chase AONB. A significant negative effect has therefore been recorded for SA objective 6 (landscape and townscape) given that there is potential for adverse impacts on the setting of the AONB.</p> <p>The Council intends for the matter relating to potential biodiversity impacts to be fully considered as further Site Assessment work is taken forward by the Council outside of the Local Plan SA process. Site specific comments can be considered as part of this site assessment process.</p>
IOSA2	Church Commissioners (Barton Wilmore)	<p><b>Site Option NE10</b></p> <p>The SA shows a rather neutral score in terms of sustainability and the benefits would be that it is in a strategic location, biodiversity could be enhanced, it is well screened by woodland, it is part</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon following the production of the August 2016 SA Scoping Report. Design details are not known for all sites and will not necessarily be those promoted by developers, therefore assessments have not assumed mitigation will</p>

		<p>brownfield, the greenfield part of the site is Grade 4 agricultural land, access is available and there is a right of access to the site (although not in the client's ownership), low flood risk and will not have an impact on the AONB. In terms of pollution this scores negative in the SA due to links with the AQMA, but the site is close to open space and Public Rights of Way and at least one of these features is also included within the site's boundaries so it should be possible to mitigate for any impacts.</p>	<p>be provided, to ensure consistency across the entirety of the SA Report. Appraisal work has been undertaken at a level of detail that is proportionate to the plan.</p> <p>In relation to the individual points raised relating to the appraisal of Site Option NE10:</p> <p>As the site is located within 250m of three locally designated biodiversity sites a minor negative effect has been recorded for SA objective 1 (biodiversity).</p> <p>The appraisal of the site has recognised that the north western corner of the site is brownfield land, however it is mostly greenfield land (which it is recognised to be of Grade 4 agricultural quality). The site is also in close proximity to the AQMAs on Watling Street and Walsall AQMA meaning that an uncertain significant negative effect has been recorded for SA objective 2 (pollution).</p> <p>The site is recognised to be outside of flood zones 2 and 3 as part of the appraisal but SA objective 5 (flooding) also considers whether the site is currently greenfield or brownfield, given that development on greenfield land would increase the area of impermeable surfaces in Cannock Chase. As the site is mostly greenfield land an uncertain minor negative effect has been recorded for SA objective 5 (flood risk).</p> <p>The site has been recognised as not falling in close proximity to the AONB and therefore development at this location is not expected to impact upon this designated landscape or its setting. The assessment against SA objective 6 (landscape and townscape) has noted that the site is identified as lying within CP22 (Planned Coalfield Farmlands) in the Landscape Character Assessment and this area has a moderate level of sensitivity to development. As such a minor negative effect has been recorded for SA objective 6.</p> <p>The site has been recognised as being located adjacent to areas of semi-natural greenspace, as well as in close proximity to a number of PRowWs and a greenway. However given that two PRowWs run within the site boundary the use of these features may be lost dependent upon the design of development which might come forward at this location. As such an overall mixed effect (significant positive/uncertain minor negative) has been recorded for SA objective 13 (recreation).</p>
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IOSA3	Environment Agency	Note previous comments on the scoping have been taken into account. Welcome Table 2.2 which shows how SEA topics within the Environment Agency remit are addressed. The supporting evidence for the next stage of this plan must contain full justification in terms of the Sequential Test to demonstrate how flood risk has been taken into account. Ideally this should be a stand alone document to support the Sustainability Appraisal.	Comment noted. Discussions with the Environment Agency are ongoing in relation to matters regarding the sequential test.
IOSA4	Lichfield and Hatherton Canals Restoration Trust	Table 3.1- Hatherton Canal restoration will present opportunities for sustainable transport – specifically including walking which brings health benefits.	Table 3.1 presents the Key Sustainability Issues for Cannock Chase and Likely Evolution without the Local Plan (Part 2). It is accepted that the key sustainability issues for the District have been suitably covered by this table and linked to the potential evolution of the District without the adoption of the Local Plan (Part 2). Whilst this comment is noted, the delivery of one specific restoration scheme in the District is not considered to be a key sustainability issue.
IOSA5	Lichfield and Hatherton Canals Restoration Trust	Paragraph 4.76- if the assessment is updated reference could be made to the Hatherton Canal restoration providing opportunities for management of flood risk by attenuation of storm water flows (and in the Local Plan document).	Paragraph 4.76 presents a summary of the findings of the employment site options in relation to SA objective 5 (flooding). Issue BE1 (the full appraisal matrix for this is presented in Appendix 10 and the summary of likely sustainability effects is presented in Chapter 5) contains reference to the potential safeguarding of the route for the Hatherton Branch Canal proposal as part of an assessment of submitted sites for potential allocation for recreation/leisure/tourism proposals. The inclusion of the potential safeguarding of the route for the Hatherton Branch Canal proposal has been suggested as one of a number of options and therefore cannot influence other appraisals. An assessment of in-combination effects of policies and site allocations will be undertaken once the preferred options are identified for the Local Plan.
IOSA6	Lichfield and Hatherton Canals	Page 20-21-The reference to the sensitive ecological site of the Cannock Extension Canal refers specifically to that site and	The 15km Zone of Influence has only been identified for the Cannock Chase SAC and not the Cannock Extension Canal SAC. This Zone of Influence has been identified following the production of evidence to support the production of the

	Restoration Trust	not to a zone of influence around it.	Council's Local Plan (Part 1) Policy CP13 (Cannock Chase Special Area of Conservation (SAC)). This work identified that " <i>in combination</i> " impact of proposals involving a net increase of one or more dwellings within a 15 kilometre radius of the SAC would have an adverse effect on its integrity unless avoidance and mitigation measures are in place; with a significantly higher proportion of visitors coming from within 8km. There is no equivalent evidence base or Zone of Influence for the Cannock Extension Canal SAC.
IOSA7	Lichfield and Hatherton Canals Restoration Trust	Paragraph 4.85- if the assessment is updated, canal towpaths such as alongside the restored Hatherton Canal could be mentioned.	Paragraph 4.85 presents a summary of the findings of the employment site options in relation to SA objective 8 (sustainable transport). Issue BE1 (the full appraisal matrix of which is presented in Appendix 10 and the summary of likely sustainability effects is presented in Chapter 5) contains reference to the potential safeguarding of the route for the Hatherton Branch Canal proposal as part of an assessment of submitted sites for potential allocation for recreation/leisure/tourism proposals. The inclusion of the potential safeguarding of the route for the Hatherton Branch Canal proposal has been suggested as one of a number of options and therefore cannot influence other appraisals. An assessment of in-combination effects of policies and site allocations will be undertaken once the preferred options are identified for the Local Plan.
IOSA8	Lichfield and Hatherton Canals Restoration Trust	Paragraph 5.141 -if the assessment is updated should also include mention of the restored Hatherton Canal channel and towpath as routes for habitat connectivity and sustainable transport.	Paragraph 5.141 addresses the issue of protecting the historic environment to act as a catalyst to encourage the positive regeneration of the District. As such it does not address habitat connectivity or sustainable transport issues. Issue BE1 (the full appraisal matrix of which is presented in Appendix 10 and the summary of likely sustainability effects is presented in Chapter 5) contains reference to the potential safeguarding of the route for the Hatherton Branch Canal proposal as part of an assessment of submitted sites for potential allocation for recreation/leisure/tourism proposals. The inclusion of the potential safeguarding of the route for the Hatherton Branch Canal proposal has been suggested as one of a number of options and therefore cannot influence other appraisals. An assessment of in-combination effects of policies and site allocations will be undertaken once the preferred options are identified for the Local Plan.
IOSA9	Lichfield and Hatherton	The comment from Staffordshire County Council regarding habitat connectivity has	Comment noted.

	Canals Restoration Trust	a particular relevance to the proposal to restore the Hatherton Canal as the towpath and water channel will create new routes and connections.	
IOSA10	Lichfield and Hatherton Canals Restoration Trust	Page 144- there is a reference to multifunctionality in relation to Green Infrastructure. Would mention the proposed Hatherton Canal as an example of this concept.	Page 144 is part of the 'Review of plans, policies and programmes' presented in Appendix 2 of the SA Report. The concept of multifunctionality of green infrastructure has been included as part of the review of plans, policies and programmes to guide the production of the Local Plan (Part 2) and the SA Report. The purpose of this inclusion is to reflect the objectives of Natural England's guidance in relation to green infrastructure in the production of the Local Plan (Part 2) and the undertaking of the SA Report and not to comment on any specific potential restoration scheme.
IOSA11	Middleton White S	<p>The IIA contains some apparently contradictory indicators in respect of the benefits of developing site R112 (the field between Slitting Mill and Hednesford Rd). It suggests that sustainable transport is a significant plus (not sure how this is established) whilst at the same time noting that it faces significant risk of pollution. Building a large estate in a dip between two AONB is likely to encourage pollution to sit above the housing, impacting both on the new build residents and the already established housing that sits on a slightly elevated line on the Slitting Mill Rd, as well as the Chase itself.</p> <p>Assuming 1 to 2 cars per household the increase in traffic on the Hednesford Rd and the resulting use of Slitting Mill Rd as a "rat run" will not only increase pollution</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon following the production of the August 2016 SA Scoping Report. The specific findings for site option R112 are presented in Appendix 5 of the SA Report. Full justification text for the findings presented is also provided in this appendix.</p> <p>SA objective 8 seeks to encourage and facilitate the use of sustainable modes of transport in the District. This objective has been appraised on the basis of proximity to sustainable transport links and access to local amenities. As site option R112 is located within 1km of a railway station (Rugeley Town Train Station) and within 350m of at least one bus stop (bus stops can be accessed within 350m of the site on Post Office Lane and Hednesford Road) a significant positive effect has been recorded for this SA objective. The frequency of the bus services available at nearby bus stops (once every 30 minutes on Hednesford Road) has been taken into consideration for the scoring of this SA objective.</p> <p>SA objective 2 addresses the potential for site options to result in adverse impacts in terms of pollution. The potential promotion of sustainable transport in Cannock Chase has been considered discreetly from this through SA objective 8 as previously described. SA objective 2 has been appraised in relation to potential impacts on</p>

		<p>but also the risk to wildlife and pedestrians / cyclists that make use of the area. This represents a risk to the recreational / tourist reputation of the area, as well as the wellbeing of local residence and wildlife.</p>	<p>AQMAs, development on higher value agricultural soils and within Source Protection Zones. Development at site option R112 would be on higher value agricultural land and within Source Protection Zone 3. The significant negative effect is therefore expected specifically in terms of potential increased levels of pollution affecting soil and water quality. As the site is adjacent to the A460 there is also potential for adverse impacts in terms of higher levels of noise pollution which new residents may be subject to. Development at site R112 is expected to have negligible effects with regards to air pollution.</p> <p>SA objective 12 addresses public health and the provision of development which is accessible of health facilities. As site option R112 is not located within close proximity of any existing healthcare facilities a minor negative effect has been recorded.</p> <p>Impacts on local wildlife have been considered through SA objective 1 (biodiversity). This SA objective has been appraised with consideration for the proximity of biodiversity sites to development site options considered. As Slitting Mill Brook is located partially within the site and has been identified as a Biodiversity Alert Site which is a local designation a minor negative effect has been recorded for this SA objective. The site is also located within 1.6km of Cannock Chase SAC and as such there may be potential for increased recreational pressures at this European site as a result of new residential development.</p> <p>The SA has not made any assumptions about driving habits as this depends on a variety of factors including the decision making of residents. There is currently no supporting transport modelling to inform any potential assessment of the impact development might have on this issue.</p>
IOSA12	Natural England	<p>Welcome the SA report. Set out specific comments on housing and employment issues (set out above under relevant chapter/site).</p>	<p>Comment noted.</p>
IOSA13	Natural England	<p>Air quality – ‘In combination effects’ on European designated sites. Provided advice to the Council on the subject of</p>	<p>Noted. The Council’s discussions are currently ongoing with Natural England with regard this matter. In-combination effects on air quality will be considered through the HRA and the results of the HRA incorporated into the SA.</p>

		<p>assessing air quality in local plans in its capacity as a member of the Cannock Chase SAC Partnership in our advice letter dated 30.4.2012. Highlight the following, recent High Court judgement:</p> <p>A High Court judgment was handed down on 20 March 2017 in Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) (copy attached). Wealden District Council brought a challenge against a Joint Core Strategy produced by two of its neighbouring authorities. Natural England provided advice to Lewes District Council and the South Downs National Park Authority on the assessment of air quality impact on Ashdown Forest SAC. This advice was based on nationally developed guidance agreed with other UK statutory nature conservation bodies. The court found that Natural England’s advice on the in-combination assessment of air quality impacts in this case was flawed. We are considering the details of this decision and the implications for our advice. Competent authorities should seek their own legal advice on any implications of this recent judgment for their decisions.</p>	
IOSA14	Natural England	Welcome the use of the 1Km distance threshold as a precautionary measure at	It is considered that adopting an approach which takes an agreed threshold into account is proportionate to this strategic approach.



		<p>this stage. However would advise that impacts may occur over longer distances depending on the nature of the development (or 'project') and ecological linkages between the development and the European designated site.</p>	<p>The HRA will consider effects of the plan on European sites in more detail. The SA will take account of the results of the HRA.</p>
IOSA15	Staffordshire County Council	<p>There are sites where SA may have over or under estimated biodiversity impacts. Also appears not all sites have been subject to SA. Distance criteria do not reflect potential pathways so findings may not be reliable in all cases. Impacts can be assessed at the strategic level for a number of sites which are detailed. It may not be in the interests of sustainable development to allocate sites with high biodiversity impacts. The SA does not include Ancient Woodland or habitats of principal importance in the impact assessment although there is good quality GIS mapping of these available through Staffordshire Ecological Record (SER).</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation. The SA Assumptions have not taken areas of Ancient Woodland or habitats of principal importance into account and have instead taken the proximity of sites to designated local, national and international biodiversity and geodiversity sites into consideration. As such SA objective 1 (biodiversity and geodiversity) has been considered in line with these assumptions.</p> <p>All sites which are considered to be reasonable alternatives (i.e. meet the Council's assessment criteria as detailed in the 'Approach to Allocations and Standards' section of the Issues and Options document) have been subject to the SA process. The Issues and Options Local Plan (Part 2) has not set out which sites will be allocated for development at this stage. It is accepted that the allocation of sites with high biodiversity impacts would be in contrast to one of the pillars of sustainable development and the SA Report has sought to identify the potential negative effects of those sites which are likely to have higher biodiversity value. Site specific habitat assessments are considered to be outside the scope of the SA Report, as SA is required to conduct a strategic assessment of all site options in the same level of detail, and a level of detail that is proportionate to the plan.</p> <p>A 15km Zone of Influence has been identified around the Cannock Chase SAC within which a net increase of one or more dwellings has been identified as likely to have an adverse effect on its integrity unless avoidance and mitigation measures are in place. The SA considers these potential adverse impacts through SA objective 1</p>

			<p>(biodiversity and geodiversity). A minor negative effect has been recorded for residential sites located within 15km of the SAC. The HRA will consider effects of the plan on European sites in more detail. The SA will take account of the results of the HRA. Distance thresholds have been used for the appraisal of likely sustainability effects because they account for most pathways. If an obvious pathway for significant effects further afield is identified the SA will consider this.</p> <p>The Council has identified that work is currently being undertaken with relevant parties to address issues of biodiversity impacts which are then be fed into an updated assessment of sites. Policy CP12 in the Local Plan (Part 1) will ensure that biodiversity is taken into consideration at the planning application stage.</p>
IOSA16	Staffordshire County Council	SA carried out without ref to HECA Addendum – strongly advise this is used to update SA.	Comment noted. SA will be updated accordingly. The addendum was not available at the time of the initial SA.
IOSA17	Staffordshire County Council	Site N13a Natural and historic environment constraints limit capacity. This does not appear to be reflected by SA.	<p>The suggested dwelling capacity has been supplied by the Council and has been used as a guide to residential site size. The potential capacity has also been used to identify where sites might be capable of delivering supporting infrastructure (new affordable homes, education facilities and green space) in line with local planning policy. As the site capacity is merely suggested at this stage and in order to maintain consistency between appraisals of individual sites the SA has focussed on appraising the general effects of developing within each site area.</p> <p>The full appraisal undertaken for residential site N13a is presented in Appendix 5 of the SA Report. Impacts on the natural environment have been considered through a number of distinct SA objectives most notably SA objective 1 (biodiversity and geodiversity), SA objective 3 (previously developed land) and SA objective 6 (landscape and townscape). In line with the SA objectives the site has been recorded as having a minor negative effect on SA objective 1 as it is located within close proximity of a local biodiversity designation. A significant negative effect has been recorded for SA objective 3 given that the site is larger in size (20 homes are suggested) and is located on greenfield land. A minor negative effect has been recorded for SA objective 6 as the site is located on land which has been identified as having a moderate level of sensitivity to development through the Landscape Character Assessment and is not located within 1km of the AONB. Effects on the</p>

			<p>historic environment have been considered through SA objective 17. As the Cannock Chase District HEA has identified the area within which the site lies as being of moderate value in terms of heritage assets a minor negative effect has been recorded for this SA objective.</p> <p>Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA18	Staffordshire County Council	<p>C80: The Sustainability Appraisal notes that the site is located partially within Hednesford Brickworks Site of Biological Importance yet classifies negative impacts on biodiversity as minor. This appears not to be appropriate unless supported by up-to-date survey and assessment.</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised to give a minor negative effect for those sites which are located within 250m of a locally designated biodiversity or geodiversity site or within between 250m and 1km of a national or international biodiversity or geodiversity site. The assumption also gives consideration for proximity of residential development sites to the Cannock Chase SAC (which may result in increased recreational pressures on this European site) with a minor negative effect expected on this SA objective if the site is within 15km of this designation. The negative effect on this SA objective is minor overall given that the Hednesford Brickworks Site of Biological Importance is a local designation and also considering that the closest national designation (Chasewater And The Southern Staffordshire Coalfield Heaths SSSI) is within 640m of the development site. The Cannock Chase SAC is located within 3.0km of the site. The Council has identified that work is currently being undertaken with relevant parties to address issues of biodiversity impacts which are then be fed into an updated assessment of sites. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA19	Staffs County	<p>C270: Walkmill Claypit SSSI is designated for white clawed crayfish and is a discrete</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed</p>

	Council	<p>site. Impacts on the interest of the SSSI would be by pollution of the water body or introduction of alien crayfish species or crayfish plague. Development of this site for residential use is unlikely to result in harm providing suitable pollution control and drainage measures are included. The SA may have over-estimated risk of impacts. Discussion with natural England is recommended. (N.B SCC takes over responsibility of the site in the near future.)</p>	<p>in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised to give a minor negative effect for those sites which are located within 250m of a locally designated biodiversity or geodiversity site or within between 250m and 1km of a national or international biodiversity or geodiversity site. Those sites which are located within 250m of a national or international biodiversity or geodiversity site are expected to have a significant negative effect on SA objective 1. This more significant potential negative impact has been recorded given that providing new development in closer proximity to biodiversity and geodiversity sites may result in increases in habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure, etc. It should be noted that appraisal undertaken as part of the SA has applied a precautionary approach. As such a significant negative effect is expected on this SA objective given that the Walkmill Claypit SSSI (a national biodiversity designation) is located within 125m of site C270. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA20	Staffs County Council	<p>C116(a): Substantial constraints to capacity due to woodland. The SA seems to underestimate biodiversity impacts.</p>	<p>The suggested dwelling capacity has been supplied by the Council and has been used as a guide to residential site size. The potential capacity has also been used to identify where sites might be capable of delivering supporting infrastructure (new affordable homes, education facilities and green space) in line with local planning policy. As the site capacity is merely suggested at this stage and to maintain consistency between appraisals of individual sites the general effects of developing within each site area have been appraised. The SA has considered biodiversity impacts through SA objective 1 (biodiversity and geodiversity). The expected sustainability effects have been assigned in line with the SA Assumptions to ensure consistency of appraisal given the large number of sites considered. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan AS process.</p>

IOSA21	Staffs County Council	C116(b): Includes Newlands Brook Fields Site of Biological Importance and other habitats of potential value that would limit capacity considerably or require substantial off-site compensation. The SA underestimates biodiversity impacts.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised to give a minor negative effect for those sites which are located within 250m of a locally designated biodiversity or geodiversity site or within between 250m and 1km of a national or international biodiversity or geodiversity site. As such a minor negative effect is expected on this SA objective given that the biodiversity designations Newlands Brook Fields, Fields and Pool at Newlands Brook SBI, Newlands SBI and Newlands Brook Woodland SBI) which are within 250m of site C116(b) have been designated at a local level. The minor negative effect expected also takes account of the proximity of the Cannock Chase SAC which lies approximately 4.4km from site C116(b). Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA22	Staffs County Council	R30: Development of this site would not be in accordance with policy or protected species legislation and licensing. The area is part of the Slitting Mill Brook Biodiversity Alert Site and is composed mainly of a balancing pool that supports white clawed crayfish including, as is understood, a recently translocated population. A stream supporting crayfish also flows through the site the remainder of which is woodland. The SA underestimates biodiversity impacts.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised to give a minor negative effect for those sites which are located within 250m of a locally designated biodiversity or geodiversity site or within between 250m and 1km of a national or international biodiversity or geodiversity site. As such a minor negative effect is expected on this SA objective given that the biodiversity designations Slitting Mill Brook SBI which is partially within the site has been designated at a local level. The</p>

			<p>minor negative effect expected also takes account of the proximity of the Cannock Chase SAC which lies approximately 2.2km from site C116(b). Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA23	Staffs County Council	<p>R37: Further assessment would be required prior to allocation. The site may support habitat complementary to Cannock Chase SAC that should be retained in accordance with the approved SAC mitigation measures. The SA appears to be based on insufficient information.</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised as having an expected minor negative effect as there are no locally, nationally or internationally designated sites within 1km of site R37. The appraisal also considered the proximity of the Cannock Chase SAC with an overall minor negative effect recorded as the site is located within the 15km Zone of Influence around this designation. It is expected that the proximity of new residential development to this European site may result in increased levels of recreational pressures. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA24	Staffs County Council	<p>R83: Site appears to be well used POS supporting habitats complementary to Cannock Chase SAC that may qualify as habitat of principal importance (NERC Act s40-41) and should be retained and enhanced in accordance with the approved SAC mitigation measures. The SA appears to underestimate biodiversity impacts.</p>	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised as having an expected minor negative effect as it is located within 250m of Chetwynd's Coppice SBI which is a local designation. The appraisal also considered the proximity of the Cannock Chase SAC with an overall minor negative effect recorded as the site is located within the 15km Zone of Influence around this designation. Site specific</p>

			comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.
IOSA25	Staffs County Council	R112: Scale and proximity to the Cannock Chase SAC would mean that bespoke Habitats Regulation Assessment (HRA) is likely to be required of proposals to develop this site for residential use. The SA underestimates potential biodiversity impact.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised as having an expected minor negative as although Slitting Mill Brook SBI is partially within site R112 it is a local designation. The appraisal also considered the proximity of the Cannock Chase SAC with an overall minor negative effect recorded as the site is located within the 15km Zone of Influence around this designation. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA26	Staffs County Council	N49: Survey and assessment would be required prior to allocation. Likely to support habitat of principal importance with high potential for protected and priority species. Wetland and grassland habitats with a strong network of hedgerows likely to be species rich. Habitats present may mean that the site, or parts, qualifies as a Local Wildlife Site (Site of Biological Importance). Likely to form important complementary habitat to the Chasewater and Southern Staffordshire Coalfield Heaths SSSI contributing to the local habitat network. The SA appears to underestimate biodiversity impacts.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>SA objective 1 (biodiversity and geodiversity) has been appraised as having an expected minor negative as site N49 is within 250m of two Sites of Biological Interest. These are biodiversity designations which have been set at a local level. The site is also located within the 15km Zone of Influence which has been set around the Cannock Chase SAC within which further recreational pressures might result from additional residential development. The strategic nature of the SA means that more detailed site assessment is not considered to be appropriate at this stage. The Council has however identified that work is currently being undertaken with relevant parties to address issues of biodiversity impacts which are</p>

			then be fed into an updated assessment of sites. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.
IOSA27	Staffs County Council	N52: There is potential for significant impact on Washbrook Lane Biodiversity Alert Site recorded as supporting species-rich hedgerow habitat of principal importance unless access can be obtained from alternative highways. Access requirements require establishment prior to allocation to avoid this significant-off-site impact. The SA appears to underestimate biodiversity impacts.	Washbrook Lane Biodiversity Alert Site is located adjacent to the site to the west. As such there is potential for adverse impact on this biodiversity designation. The negative effect recorded on SA objective 1 (biodiversity and geodiversity) will remain as a minor negative however as this is a local biodiversity designation. The minor negative effect has been recorded in the current iteration of the SA report given that allowing for additional residential development within 15km of the Cannock Chase SAC may result in further recreational pressures on this European designation. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.
IOSA28	Staffs County Council	CE17: This site is composed of existing green infrastructure of high biodiversity value and potential Local Wildlife Site (site of Biological Importance) status. Survey and assessment is required to inform allocation decisions. The site supports extensive species-rich grassland habitat of principal importance as well as other habitats including wetland and woodland. The area has public access and is well used. The SA underestimates biodiversity impacts.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation.</p> <p>Potential impacts on biodiversity and geodiversity which might result due to the potential development of site CE17 have been considered through SA objective 1. As the site is not residential the 15km around the Cannock Chase SAC has not been considered given that it only applies to recreational pressures which would likely result from new residential. As site CE17 contains part of Washbrook Lane Biodiversity Alert Site which is a local biodiversity designation a minor negative effect is expected on this SA objective. The strategic nature of the SA means that more detailed site assessment is not considered to be appropriate at this stage. The Council has however identified that work is currently being undertaken with relevant parties to address issues of biodiversity impacts which are then be fed into an updated assessment of sites. Site specific comments can be considered as part</p>



			of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.
IOSA29	Staffs County Council	CE20 & NE6: potential impact on the Cannock Extension Canal SAC. Bespoke HRA required if these sites are taken forward. Site support hedgerows of possible high importance that may merit retention in accordance with the NPPF and Local Plan policy, limiting plot size. The SA appears to underestimate biodiversity impacts.	<p>In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report. Consultation responses received in relation to the SA Scoping Report are presented in Appendix 1 of the SA Report. Any further changes which might be made to the assumptions at this stage would require further consultation. Potential impacts on biodiversity and geodiversity through the potential development of sites CE20 and NE6 have been considered through SA objective 1. A minor negative effect has been recorded for site CE20 as it is located within 250m of two locally designated biodiversity sites. As this site was appraised for employment use the 15km Zone of Influence around the Cannock Chase SAC was not taken into consideration given that this relates to any potential additional recreational pressures which may occur as a result of residential development. A significant negative effect has been recorded for site NE6 for this SA objective. The site is located within 250m of two locally designated biodiversity sites and the Cannock Extension Canal SAC and SSSI. The strategic nature of the SA means that more detailed site assessment is not considered to be appropriate at this stage. The Council has however identified that work is currently being undertaken with relevant parties to address issues of biodiversity impacts which are then be fed into an updated assessment of sites. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p> <p>The HRA for the Local Plan (Part 2) will assess potential impacts of site allocations likely to have an adverse effect upon designated sites. The results of the HRA will be incorporated into the SA.</p>
IOSA30	Staffordshire County Council	Site R126: Further assessment required prior to allocation. Site may support habitat complementary to Cannock Chase SAC that should be retained in	The full appraisal undertaken for residential site R126 is presented in Appendix 5 of the SA Report. SA objective 1 has considered the potential impacts on biodiversity and geodiversity. Once preferred sites for allocation have been identified, the HRA will assess the potential effects of development at these sites on European sites in

		<p>accordance with approved SAC mitigation measures. SA appears to be based on insufficient information.</p>	<p>more detail. The findings of the HRA will be taken into account in the SA.</p> <p>The Council is currently working with relevant parties to address issues of biodiversity impacts which are then be fed into an updated assessment of sites. Site specific comments can be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA31	St Modwen (RPS) re Watling St Business Park	<p>The Sustainability Appraisal (SA) that accompanies the LPP2 consultation document has scored each of the potential employment (and other) allocations. The land adjacent to Watling Street Business Park has been scored almost identically to the potential expansion sites at Kingswood Lakeside demonstrating that overall, the SA process considers the expansion at Watling Street to be equally sustainable to expansion at Kingswood Lakeside. It is noted that there is no clear assessment of cumulative impacts of development within the SA.</p> <p>This is particularly relevant in relation to the parcel of land to the west of Watling Street Business Park which is an option for both employment and GTTS use. No assessment has been undertaken of the potential cumulative effect of GTTS use and the expansion of Watling Street Business Park, further there is no assessment of the potential impacts upon amenity for the potential GTTS site caused by the expansion of Watling Business Park.</p>	<p>The sites in question at Watling Street Business Park and Kingswood Lakeside are sites CE20 and CE17 and CE18 respectively. These sites are similarly sized and contain mostly greenfield land. Although they do not lie in close proximity of each other they are similarly related to features which are likely to influence how sustainable new development will be at each location. In order to ensure consistency across the SA, SA appraisals have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. These are in keeping with the SEA Regulations and have been consulted on following the production of the August 2016 SA Scoping Report.</p> <p>None of the sites are within close proximity of existing sustainable transport nodes or town centres. The sites in question are however located in close proximity of local biodiversity designations. One of the Kingswood Lakeside sites (CE17) and the Watling Street site are located in close proximity to AQMAs while the other Kingswood Lakeside site is located on Grade 3 agricultural land meaning a significant negative effect has been recorded for all sites with regards SA objective 2 (pollution). The only marked difference between the scores for the sites in question is for recreation with a mixed effect scored for one of the Kingswood Lakeside sites (CE17) as an area of open space and number of PRoWs are within the site boundaries meaning that these uses might be lost as a result of development. The scores for recreation for the other sites are the same as they are both within close proximity of a number of open spaces and PRoWs.</p> <p>It is not possible to assess the cumulative effects of the plan at the Issues and Options stage as it has not been decided which site or policy options will be taken forward. The SA Report of the next stage of the plan will include an assessment of the expected cumulative effects. The cumulative effects assessment will not include specific combinations of individual sites, as the cumulative effects of allocating sites at any specific settlement will not be entirely separate from other</p>

			allocations in the plan. The SEA Regulations require the cumulative effects of implementing the plan to be appraised and reported upon. As such the approach of considering the cumulative effects of the plan in its entirety is considered to be appropriate and proportionate.
IOSA32	Taylor Wimpey (Lichfields)	The assessment of site C279 (land east of Wimblebury Rd) at appendix 5 of the SA should reflect land in control of Taylor Wimpey. The assessment is currently based on a much wider area and the assessment needs to be updated. This should result in an improved SA score which reflects the scale of development being promoted.	<p>The appraisal of sites has been based upon those boundaries which have been supplied by the Council at the time of the production of the Local Plan (Part 2). As clarified in paragraph 2.21 of the SA Report:</p> <p><i>“An initial list of reasonable alternative residential site options for the Local Plan (Part 2) was identified by the Council drawing on the most recent Strategic Housing Land Availability Assessment. Consideration was then given to whether sites had recently been promoted and were therefore considered to be ‘available’ – where a site has been promoted by a landowner since 2007 via the ‘Call for Sites’ process or via other Local Plan consultations, it has been taken forward for assessment. The Council intends to explore further information about the availability of sites during the consultation on the Issues and Options.”</i></p> <p>However, any amendments to site boundaries in the next stage of the process will be reflected in an updated SA.</p>
IOSA33	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	The SA framework should be strengthened – For example, Objective 3 – it does not address land use properly in that it only refers to previously used land or buildings. The objective should address land use in more general terms – brownfield/greenfield/green belt/agricultural. The objective should also address quality issues – grade of agricultural land, green belt release, constrained sites etc.	<p>The SA Framework and associated assumptions used to appraise the site options considered in the SA Report are in keeping with the SEA Regulations and have been consulted upon following the production of the August 2016 SA Scoping Report. These are presented in Appendix 4 of the SA Report.</p> <p>SA objective 2 considers whether development at each site option would result in the use of land which is of higher agricultural value as per its agricultural land classification. SA objective 3 considers whether sites appraised are brownfield or greenfield in relation to the potential for re-use of existing materials or buildings which might already be onsite.</p> <p>The SA Report considers the potential sustainability effects of the site and policy options of the Local Plan (Part 2). As Green Belt is a planning policy tool it does not necessarily reflect sustainability issues within the District. The Local Plan (Part 2) considers Green Belt boundary changes as set out in the ‘Approach to Allocations and Standards’ of this document. As such it is deemed more appropriate to</p>

			appraise sites with regard to the loss of greenfield land (through SA objectives 2 and 3) and the potential impacts of development on landscape character (SA objective 6). This approach is considered to be appropriate particularly given that brownfield sites may currently be present in the Green Belt and considering that Green Belt sites may not necessarily be of high sensitivity in terms of their landscape sensitivity.
IOSA34	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	Infrastructure requirements are not properly addressed – capacity of current systems – energy, water, sewerage, waste, transport, green infrastructure and the potential for new infrastructure.	Where local planning policy would require the provision of new infrastructure once the relevant dwelling capacity threshold has been met (i.e. new school places, new green space and new affordable homes) the suggested capacity of the sites has been used to inform the findings of the SA. SA objectives 9 (housing), 10 (education) and 13 (recreation) take the potential capacity of each site into consideration in this manner with positive effects likely where new affordable housing, new school places or new green space would be required to be provided as per relevant policies in the Local Plan Part 1. The potential requirement for improved infrastructure beyond these issues (through S106 or CIL for example where specific thresholds are not stated in the Local Plan Part 1) which might be required to support new development in the District are detailed matters to be considered at the development proposal stage. The SA Report is a higher level and more strategic appraisal of development site options.
IOSA35	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	Viability and deliverability are not addressed.	The viability and deliverability of individual site options is outside of the scope of the SA Report. The Council has undertaken the Strategic Housing Land Availability Assessment (July 2016) and Employment Land Availability Assessment (August 2016) to identify sites which have potential for the delivery of these types of development and to inform local planning policy. The ‘Approach to Allocations and Standards’ section of the Issues and Options Local Plan (Part 2) identifies that sites’ availability and deliverability has informed those sites which have been put forward to be appraised as part of SA Report and these issues will be considered as part of the further site assessment process to be undertaken by the Council outside of the Local Plan SA process.
IOSA36	Upton Trust and Carney Brothers Ltd c/o Wardell	Housing only addresses the number and then assumes if above 11 units there will be affordable housing. Does not reflect	National planning policy through the NPPF (paragraph 50) requires local authorities to “ <i>deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive, and mixed communities</i> ”. National

	Armstrong	type, mix, tenure, density and viability of affordable housing.	<p>planning policy through the NPPG sets a threshold of 11 or more dwellings stating that sites capable of delivering housing of equivalent amounts should include affordable homes onsite. As such SA objective 9 (housing) states that those sites which have capacity for 11 or more homes would include affordable homes and therefore a significant positive effect is likely.</p> <p>As details regarding housing type, mix, tenure, density and viability of affordable housing are not available on a consistent basis (and in many cases not yet decided or known), this cannot be taken into account in the SA.</p>
IOSA37	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	Does not include indicators and targets which will be used in the monitoring of the plan and should be used as a reference when undertaking the assessment. A proposed monitoring framework is provided separately but again does not reflect all the key issues. The Green Belt is not mentioned.	<p>Table 6.1 of the SA report presents the proposed Monitoring Framework for the Local Plan (Part 2). This has been related to the individual SA objectives against which the appraisal has been undertaken. Proposed monitoring indicators have been included for each of the SA objectives.</p> <p>As highlighted at paragraph 6.2 of the SA Report <i>“as the Local Plan (Part 2) is progressed further and the likely significant effects are identified with more certainty, it may be appropriate to narrow down the monitoring framework to focus on a smaller number of the SA objectives.”</i> This approach will allow for the likely significant effects of the Local Plan to be monitored and for appropriate mitigation or enhancement to be incorporated through planning policy and development management decision making.</p> <p>The SA Report considers the potential sustainability effects of the site and policy options of the Local Plan (Part 2). As Green Belt is a planning policy tool it does not necessarily reflect sustainability issues within the District. The Local Plan (Part 2) considers Green Belt boundary changes as set out in the ‘Approach to Allocations and Standards’ of this document. As such it is deemed more appropriate to appraise sites with regard to the loss of greenfield land (through SA objectives 2 and 3) and the potential impacts of development on landscape character (SA objective 6). This approach is considered to be appropriate particularly given that brownfield sites may currently be present in the Green Belt and considering that Green Belt sites may not necessarily be of high sensitivity in terms of their landscape sensitivity.</p>

IOSA38	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	All the residential sites are scored 0 for climate change - negligible or no effect. Given that the assessment does not include mitigation measures this cannot be accurate. All development will have a likely negative impact on climate change, which could be reduced through mitigation.	The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. Impacts of the Local Plan (Part 2) in terms of climate change have been considered through SA objective 4. The assumptions have been presented to ensure consistency between the appraisals of all sites considered. As stated in the appraisal for all housing sites the effects of new housing development on SA objective 4 (climate change) will be dependent to some extent on design, for example whether they incorporate renewable energy generation on site or include SuDS. The SA Report is a strategic study that uses consistent data across the local authority area in order to give like-for-like assessments for each site. As design details are not known for all sites at this stage the baseline situation assuming no mitigation has been considered to ensure consistency across the entirety of the SA Report. The location of housing development sites will influence this issue in relation to whether the sites offer good opportunities for sustainable transport use and whether they are within areas of high flood risk and these factors have been considered under SA objectives 8 and 5 respectively.
IOSA39	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	The majority of results score a positive impact for waste. Again this is incorrect. Impact is likely to be negative but can be reduced through mitigation.	The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. The assumptions have been presented to ensure consistency between the appraisals of all sites considered. The SA Report is a strategic study that uses consistent data across the local authority area in order to give like-for-like assessments for each site. As design details are not known for all sites at this stage the baseline situation assuming no mitigation has been considered to ensure consistency across the entirety of the SA Report. While it is true that the design of new development may influence the appropriate management of waste at new sites this baseline assumption means that the site appraisals focuses broadly on the sites location and the principle of developing within the sites' boundaries. Those sites which have been identified as lying on brownfield may promote the re-use of existing materials or buildings onsite and therefore a minor positive effect is expected for 29 of 89 residential sites considered on SA objective 7 as identified at paragraph 4.26 of the SA Report.

IOSA40	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	<p>There is an over simplification of the assessment for some significant issues e.g. All brownfield sites will have a positive impact and all greenfield sites have a negative impact. The quality of the land is not properly addressed in the assessment. Green Belt is not appropriately covered.</p>	<p>The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and associated assumptions, which are detailed in Appendix 4 of the SA Report. The NPPF contains as one of the core planning principles (paragraph 17) to <i>“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”</i>. The environmental value of sites appraised have been considered through relevant SA objectives; most notably SA objectives 1 (biodiversity), 2 (pollution), 6 (landscape and townscape) and 17 (historic environment). The SA Report is a strategic study that uses consistent data across the local authority area in order to give like-for-like assessments for each site. Appraisal work has been undertaken at a level of detail that is proportionate to the plan.</p> <p>The quality of land within the boundaries of each individual site has been considered in terms of its agricultural value as part of the appraisal of SA objective 2. Those sites which are identified as containing high value agricultural land (Grade 1, Grade 2 or Grade 3a) are expected to have an overtly negative effect on this SA objective. As Green Belt is a planning policy tool it does not necessarily reflect sustainability issues within the District. The Local Plan (Part 2) considers Green Belt boundary changes as set out in the ‘Approach to Allocations and Standards’ of this document. As such it is deemed more appropriate to appraise sites with regard to the loss of greenfield land (through SA objectives 2 and 3) and the potential impacts of development on landscape character (SA objective 6). This approach is considered to be appropriate particularly given that brownfield sites may currently be present in the Green Belt and considering that Green Belt sites may not necessarily be of high sensitivity in terms of their landscape sensitivity.</p>
IOSA41	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	<p>Positive impacts are given for sites near to educational facilities but capacity has not been addressed.</p>	<p>SA objective 10 has considered the proximity of sites to education facilities with a more favourable score recorded for those sites within at least 600m of at least one existing primary school and secondary school as well as sites which would deliver 700 or more new homes. It is expected that larger sites could result in the incorporation of new primary provision. Uncertainty has been attached to all scores as educational facilities however as the effects will depend on there being capacity at schools to accommodate new pupils or provide for school expansion which was not known at the time of the appraisal work. School capacity</p>

			information available from Staffordshire County Council is to be used by the Council to provide a narrative to the SA for their site assessment process.
IOSA42	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	There is a lack of reference to evidence e.g. The SHMA/SHLAA, Green Belt Review, Viability, infrastructure etc. If evidence is not yet available this should be made clear and result should be accepted as uncertain.	<p>The SA Report is a strategic study that uses consistent data across the local authority area in order to give like-for-like assessments for each site. Appraisal work has been undertaken at a level of detail that is proportionate to the plan. The scope of the SA report is different than that of the SHLAA (2016) and ELAA (2016) which has been undertaken separately by the Council as evidence base to support local planning policies. As explained in the Issues and Options Local Plan (Part 2) the initial list of site options have been drawn from these documents and from the Local Plan (Part 1) Policies containing specific references to future potential site allocations.</p> <p>The SA Report considers the potential sustainability effects of the site and policy options of the Local Plan (Part 2). The SEA Regulations set out how these effects might be best considered providing the list of SEA Topics the potential effect of the plan might be considered against. Table 2.2 shows how all SEA Topics have been addressed within the SA Framework and the associated assumptions. As such the approach of the SA Report is considered to best cover all topics required by the SEA Regulations.</p> <p>The issues of Green Belt, viability and infrastructure fall under the scope of the development planning and are considered to be largely outside of the scope of SA (see comments above in response to IOSA33, IOSA34 and IOSA35). Related sustainability issues are however addressed in the SA Report i.e. see comments above in relation to infrastructure (at IOSA34). The review of baseline information presented in Appendix 3 of the SA Report has helped to identify the key sustainability issues for the District using key evidence. The key sustainability issues for Cannock Chase are presented in Table 3.1 of the SA Report. Additional issues and evidence will be considered as part of the further site assessment work to be undertaken by the Council outside of the Local Plan SA process.</p>
IOSA43	Upton Trust and Carney Brothers Ltd c/o Wardell	The assessments do not address the short, medium, long term impacts, temporary or permanent, direct/indirect	It is not possible to assess the cumulative effects of the plan at the Issues and Options stage as it has not been decided which site or policy options will be taken forward. The SA Report of the next stage of the plan's development will include an assessment of the expected cumulative effects. The cumulative effects assessment



	Armstrong	or the cumulative impacts.	<p>will not include specific combinations of individual sites, as the cumulative effects of allocating sites at any specific settlement will not be entirely separate from the effects of other allocations in the plan. The SEA Regulations require the cumulative effects of implementing the plan as a whole rather than subsets of the plan to be appraised and reported upon. As such the approach of considering the cumulative effects of the plan in its entirety is considered to be appropriate and proportionate.</p> <p>All other types of likely significant effects on the environment have been considered, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary effects. Where it is considered important to an understanding of the likely significance of identified effects, their nature (e.g. short term vs. long term) will be described in the SA at future stages.</p>
IOSA44	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	A compatibility assessment of the Sustainability Objectives against the Plan Objectives has not been carried out.	The SA Report of Local Plan (Part 1) presented a compatibility test of the SA objectives against the Strategy Objectives of Local Plan (Part 1) (on page 32). The SA objectives have been kept broadly the same from previous SA Report to the SA Report of the Local Plan (Part 2) Issues and Options. Local Plan (Part 2) does not contain any Strategic Objectives. The Local Plan (Part 2) states that the <i>“issues and options have been identified in the context of the adopted Local Plan Part 1 (LPP1) which sets the strategic plan for the District up to 2028”</i> .
IOSA45	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	The report does not provide clear mechanisms to select or reject any sites or provide any conclusions on the best performing/worst performing sites, which could be anticipated given the number of sites that have been assessed.	The allocation of specific sites is outside of the scope of the SA Report which LUC has produced. The decision making process will be undertaken by the Council and reasons beyond the findings of the SA Report may be a factor in site selection. As clarified in the methodology of the SA Report (Chapter 2) the findings of the SA Report are not the only factors taken into account when determining a preferred option to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by the Council when selecting preferred options for their plan. Details of the Council’s reasons for site selection will be included in a future iteration of the Local Plan (Part 2) once these decisions have been made. Chapter 5 of the SA Report provides further information about the Council’s mechanisms for

			<p>identifying the site and policy options that are set out in the Issues and Options document.</p> <p>The tables in Chapter 4 (with more detail provided in Appendices 5 to 9) provide a summary of the likely sustainability effects of each individual site option type (Table 4.1, Table 4.2, Table 4.3, Table 4.4 and table 4.5) and these can be used to compare the likely sustainability effects of all site options considered at the Issues and Options Stage of Local Plan (Part 2).</p>
IOSA46	Upton Trust and Carney Brothers Ltd c/o Wardell Armstrong	There is also no non-technical summary.	A non-technical summary will be produced to accompany the SA Report at the Proposed Submission stage; it is not required at the Issues and Options stage.
IOSA47	Walsall MBC	Support the initial findings of the Sustainability Appraisal in relation to the potential housing sites listed in Appendix 1 that lie close to Walsall. Note that the appraisal has identified the issues of noise in relation to some of the potential traveller sites.	Comment noted.
IOSA48	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	Re site R112: Land between the Rising Brook and Hednesford Road, Rugeley. The assessment encompassed all of the land under the ownership of our client, including land west of the Chase Line. We believe that the SA should be reviewed focussing on a smaller area consisting of land between Hednesford Road and the Chase Line to the west as shown on the Preliminary Development Framework Plan contained at Appendix 2 (of the rep).	<p>The appraisal of sites has been based upon those boundaries which have been supplied by the Council at the time of the production of the Local Plan (Part 2). As clarified in paragraph 2.21 of the SA Report:</p> <p><i>“An initial list of reasonable alternative residential site options for the Local Plan (Part 2) was identified by the Council drawing on the most recent Strategic Housing Land Availability Assessment. Consideration was then given to whether sites had recently been promoted and were therefore considered to be ‘available’ – where a site has been promoted by a landowner since 2007 via the ‘Call for Sites’ process or via other Local Plan consultations, it has been taken forward for assessment. The Council intends to explore further information about the availability of sites during the consultation on the Issues and Options.”</i></p> <p>However, any amendments to site boundaries at the next stage of the Local Plan</p>

			process will be reflected in the SA at that stage.
IOSA49	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	We disagree with some of the findings of the SA. The SA states that R112 will have a minor negative effect in relation to the 'reduce the risk of flooding' objective. This is because land east of the railway includes Rising Brook and its associated flood plain. However, according to the Environment Agency flood map, land east of the railway line is entirely within Flood Zone 1. As such, the area shown Preliminary Framework Plan would perform better in relation to this SA objective.	The full appraisal matrix for site R112 is presented in Appendix 5 of the SA Report. The appraisal of all site options has been undertaken in line with the SA Assumptions which are presented in Appendix 4 of the SA Report to ensure consistency.  Site R112 has been identified as likely to have a minor negative effect on SA objective 5 (flooding). Although the site is mostly outside of flood zone 3 it is on greenfield land. As such its development would increase the area of impermeable surfaces in the District to the detriment of local flood risk.
IOSA50	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	Objective 6 discusses landscape matters. It notes that the site is located within SF07 (Ancient Settled Farmlands), which is stated as having a moderate level of sensitivity to development. However, the SA concludes that an 'overall significant negative effect is expected on this SA objective'. We strongly disagree with this assessment.  Pegasus Group have conducted a Landscape Appraisal of the site which is contained at Appendix 2 (of the rep). The conclusions of this appraisal are clear that the northern part of Upper Birches Farm is capable of accommodating development -it is well related to the existing settlement and would be acceptable in landscape and visual terms.	SA objective 6 has considered the likely impacts of development at the specific site options in terms of landscape sensitivity. This SA objective has considered not only the findings of the Landscape Character Assessment for Cannock Chase District but also the proximity of the site to the AONB. As the site falls partially within the boundaries of the AONB a significant negative effect has been recorded for this SA objective in line with the SA Assumptions. The significant negative effect is uncertain in recognition that the effect on landscape may be mitigated through appropriate design considerations. As design details are not known for all sites at this stage the baseline situation assuming no mitigation has been considered to ensure consistency across the entirety of the SA Report.

		<p>This evidence points to a different conclusion than the Council's SA, and we would ask that the Council consider the submitted Landscape Appraisal when undertaking any further assessment of this site.</p> <p>The client is also exploring the option to potentially providing part of the site a Country Park that would provide a permanent and defensible boundary to the South of Rugeley. This would provide landscape and ecological benefits through new tree planting and habitat creation, and would also create a number of public benefits through the creation of recreational and amenity space.</p> <p>A landscape led scheme could be provided on site which would mitigate the impacts of the development on the Cannock Chase Area of Outstanding Natural Beauty.</p>	
IOSA51	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	<p>Agree with the findings of the SA in relation to objectives 8-10, where the site performs highly in these categories. The SA states that the site will have a significant positive effect in relation to the objective to 'encourage and facilitate the use of sustainable modes of transport'. The site benefits from an excellent location in relation to the local facilities of Rugeley, in addition to the bus stops located close to the site on Hednesford Road. The two Railway</p>	Comment noted.

		Stations in Rugeley are also located in close proximity to the site, with Rugeley Town Railway Station located within a 20-minute walk. The site is also well located in relation to existing educational facilities. The site is therefore well placed to meet future housing needs in a sustainable manner in terms of access to local facilities and public transport.	
IOSA52	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	In relation to objective 12 of the SA, it is stated that there will be a minor negative effect with regards to the aim to 'improve public health and ensure health facilities are accessible for those in need'. Although the nearest GP to the site (Sandy Lane Surgery) is located in excess of the 600m threshold, the GP can easily be accessed by the bus route serving Hednesford Road. As such, it is considered that the site is well located in relation to existing healthcare facilities and performs favourably in this objective.	In line with the SA Assumptions a minor negative effect has been recorded for SA objective 12 (health) as the site option is not located within close proximity (600m) of any existing healthcare facilities. This SA objective does not consider the proximity of the site option to sustainable transport nodes as the connectivity of the site to local services and facilities via this mode of transport has been considered separately through SA objective 8 (sustainable transport). Consideration for the site options' accessibility to sustainable transport nodes through SA objective 12 could prevent a precise appraisal of the plan's potential impact on the SEA Topics through a 'double counting' of effects.
IOSA53	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	Objective 13 relates to open spaces for leisure and recreation, with the site performing well in this category and could be higher by providing a Country Park on the western section of the site.	A significant positive effect has been recorded for SA objective 13 (recreation) for this site option as it is well related to a number of areas of open space and a number of PRoWs which new residents might make use of. The site boundaries also contain a PRoW however and the use of this current provision may be lost dependent upon the design of development which might take place on the site. As such an overall mixed effect (significant positive/uncertain minor negative) has been recorded for this SA objective. The appraisal of this site also notes that those sites over 100 homes (in line with provisions in the Council's Design SPD) may provide opportunities to incorporate open space onsite. The specific design proposals are not known at this stage for all sites considered. As such the baseline situation assuming no mitigation has been considered to ensure consistency across

			the entirety of the SA Report and therefore the consideration for potential of any proposal to include a Country Park is beyond the scope of SA Report.
IOSA54	Wright T (Pegasus) re Land at Upper Birches Farm, Rugeley	Objective 17 - The SA lists a number of listed buildings located within the parcel of land assessed. However, the land area we are proposing for housing contains no Listed Buildings or other heritage assets. It is therefore considered that residential development on this site would not lead to any negative impacts on designated heritage assets.	<p>The appraisal of sites has been based upon those boundaries which have been supplied by the Council at the time of the production of the Local Plan (Part 2). It is unclear if these differ from the land area which is referred to by the consultee. As clarified in paragraph 2.21 of the SA Report:</p> <p><i>“An initial list of reasonable alternative residential site options for the Local Plan (Part 2) was identified by the Council drawing on the most recent Strategic Housing Land Availability Assessment. Consideration was then given to whether sites had recently been promoted and were therefore considered to be ‘available’ – where a site has been promoted by a landowner since 2007 via the ‘Call for Sites’ process or via other Local Plan consultations, it has been taken forward for assessment. The Council intends to explore further information about the availability of sites during the consultation on the Issues and Options.”</i></p> <p>The identified site boundaries contain a number of Boundary Stones which are Grade II Listed. The significance of these heritage assets as per paragraph 132 of the NPPF might be <i>“harmed or lost through alteration or destruction of the heritage asset or development within its setting.”</i> This paragraph of the NPPF also states that <i>“great weight should be given to (a designated heritage) asset’s conservation”</i>.</p> <p>SA objective 17 of the SA Report seeks to protect and, where possible, enhance the built and historic environment. This objective has been appraised with consideration for any nearby designated heritage assets as well as the findings of the Cannock Chase District HEA (Historic Environment Assessment) (October 2009) which states that the area in which the site lies has low/moderate value in terms of heritage assets. As such the potential negative effect expected on the heritage assets in question and the historic environment is likely to be minor.</p> <p>However, any amendments to site boundaries at the next stage of the Local Plan process will be reflected in the SA at that stage.</p>

**Local Plan Part 2 Issues and Options Habitat Regulations Assessment scoping**

<b>Rep ID No.</b>	<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
IOHRA1	Lichfield and Hatherton Canals Restoration Trust	<p>Note that the possibility of impact on the Floating Water Plantain in the Cannock Extension Canal arising from the restoration of the Hatherton Canal was in-scope for consideration within this Assessment. Note that the assessment concluded that, as the projected route for the Canal avoids a connection with the Cannock Extension Canal this will avoid adverse effects on the integrity of this site. Note that the assessment recommends monitoring of water quality and visitor numbers and behaviour.</p> <p>Note the conflicting views of LUC in December 2016 (authors of the present HRA for CCDC) and Natural England in their discussions with Walsall Council regarding the proposed restoration of the Hatherton Canal. Consider that Natural England is referring to an out-of-date route proposal for the Hatherton Canal. Have lodged an Objection to the Publication version of the Walsall Council Plan – referring to the Duty to Co-operate regarding the cross-boundary nature of the proposed canal route. Consider that the conclusion of LUC is based on a correct understanding of the proposed canal restoration and would recommend</p>	Discussions are ongoing between Cannock Chase and Walsall Council under the Duty to Co-operate to ensure a consistent approach.

		<p>a discussion between Cannock Chase and Walsall Council.</p> <p>Note the potential risks of damage to the Cannock Extension Canal identified in Appendix 1 and that boating is not mentioned.</p>	
IOHRA2	Natural England	<p>Agree with the HRA report's conclusions and supporting narrative with the following qualifications:</p> <ul style="list-style-type: none"> <li>-Air quality and in combination effects – Please see our response under Housing Supply Issues regarding a recent High Court ruling involving Wealden District Council (and further information under the Sustainability Appraisal comments).</li> <li>-South Staffordshire District - local plan HRA commentary re recreation pressure (para 3.36) – This HRA preceded the SAC Partnership's implementation in 2015 of the chosen package of mitigation measures to address recreation pressure (the 'Strategic Access Management and Monitoring Measures').</li> <li>-Walsall Council 'Site Allocations Document' HRA (para 3.38) –the uncertainty referenced in 3.38 has been addressed and Natural England has submitted a representation to Walsall Council confirming satisfaction with the SAD's legal compliance.</li> </ul>	<p>Noted. In relation to the potential air quality and in-combination effects please see comment IOSA13.</p>